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OFFICE OF THE
EXECUTIVE SECRETARY

December 2, 1999

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Request for waiver for Peoples Telephone Company, West Tennessee
Telephone Company, Inc. and Crockett Telephone Company, Inc. in Docket No.
99-00702

Dear Mr. Waddell:

As you know, Telephone Electronics Corporation (TEC) filed a petition requesting that TEC be removed of its obligation to provide contiguous county-wide calling per Docket 96-00774 if under the dialing parity provisions its customers choose to PIC to an Interexchange Carrier (IXC) which TEC does not have a customer billing arrangement agreement with. This credit was provided due to the customers' desire for short haul calling arrangements and as ordered in Docket No. 96-00774.

On November 23, 1999, during the TRA's monthly Directors' meeting, this matter was heard and continued until its meeting on December 7, 1999. The directors directed TEC and the TRA staff to develop a means by which the customers that PIC to another IXC could still receive the contiguous county-wide credit on an interim basis even though those customers have chosen a toll provider which TEC does not bill for.

TEC and the TRA staff have come up with two possible solutions which would allow the customers to receive the credit on these calls which it would like the Directors to consider. The possible solutions are as follows:

1. The first option would be that TEC notify the customers in its first billing subsequent to approval of this method that it could receive the credit if they either mailed, faxed or brought to the telephone office at each company location a copy of their long distance bill. The customer must act within ninety days of the IXC's billing and would be subject to TEC

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being able to determine the minutes of use by mileage band. The mileage band information must be easily determinable from the telephone bill so as not to be unduly burdensome to TEC. Customers would not be allowed to deduct their contiguous county-wide credits from their TEC telephone bills on their own.

2. The second possible solution would be to develop an average rate from TEC's previous calling patterns for contiguous county-wide calling and provide contiguous county-wide credits based upon CABS minutes of use. TEC would accumulate CABS records by customers up to 60 minutes and then apply the average rate for each CABS record accumulated up to 60 minutes. TEC has the contiguous county NXX's in our database but we do not have the terminating point master, thus, we cannot rate the calls. The reason for applying an average rate is that CABS records are not processed from a terminating point master file thus mileage bands and rates per minute are undeterminable. (This would be TEC's desired method of offering the contiguous county credit as it would provide a reasonable credit to the customers and would be less of a burden for TEC or the customers.)

I would appreciate if you would distribute this proposal accordingly. If you have any questions regarding any of this, please do not hesitate to contact me at 601-354-9070.

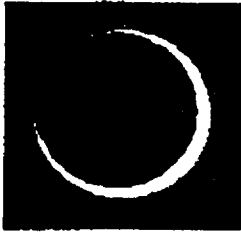
Sincerely,



Gregory Eubanks
Director, Revenue Accounting

Cc: Mr. Dale Grimes
Mr. Bob Healea
Mr. Tom Ott
Ms. Lera Roark
Mr. Jim Wingo
Mr. D. W. Work

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Telephone Electronics Corporation
Revenue Accounting
236 E. Capitol Street, 3rd Floor
Jackson, MS 39201
601-354-9070

FAX COVER SHEET

DATE: 12/3/99FAX NUMBER: 615-741-2336

TIME: _____

TO: David HoosCOMPANY: Tenn Regulatory Auth.

DEPARTMENT: _____

FROM: Greg Eubanks/nmPAGES, INCLUDING COVER: 3

COMMENT: _____

IF THIS DOCUMENT DOES NOT COMPLETELY TRANSMIT, PLEASE CALL

(601) 354-9070

FAX: (601) 352-8830

Nicole

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